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Attorneys for Plaintiff United States Small Business
Administration in its capacity as Receiver for Rocket
Ventures II SBIC, L.P.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

United States Small Business Administration in
its capacity as Receiver for Rocket Ventures II
SBIC, L.P.,

Plaintiff,

vs.

Rocket Ventures II, L.P., a California limited
partnership, et al.

Defendants.

Case No.: CV-10-4425

**STIPULATED REQUEST TO
CONTINUE PRETRIAL
CONFERENCE AND TRIAL DATES;
AND ~~PROPOSED~~ ORDER THEREON**

Plaintiff United States Small Business Administration in its capacity as Receiver for
Rocket Ventures II, L.P. ("Plaintiff") and the entity defendants, Rocket Ventures II L.P., Rocket
Ventures II CEO Fund, L.P., and Rocket Ventures SBIC Partners, LLC (collectively, the "Class

1 A Partners” and together with the Plaintiff, the “Parties”), by and through their respective
2 counsel of record, hereby stipulate and agree, subject to Court approval, as follows:

3 1. The pretrial conference and trial date in this case are currently scheduled for June
4 23, 2014 and July 21, 2014, respectively. The Court ordered that parties shall file the required
5 pretrial filings by no later than June 9, 2014. *See* Doc. No. 180.

6 2. By stipulations amongst the Parties [Doc. Nos. 27, 32, 163], the Court has
7 previously continued the pretrial conference and trial date in this case due to pending
8 appointment of an ADR evaluator, the addition of further defendants following amendment of
9 the complaint, and unforeseen circumstances requiring continuance. *See* Doc. Nos. 28, 33, 164.
10 Throughout this time, the Parties have continued to engage in settlement discussions.

11 3. Following extensive negotiations to resolve the Plaintiff’s claims against the Class
12 A Partners, the Parties have reached a settlement and are currently documenting the agreement
13 (the “Settlement Agreement”). The Parties expect that the Settlement Agreement will be
14 finalized and executed shortly (likely within the next 14 days), and, pursuant to the terms of the
15 Settlement Agreement, the Receiver shall thereafter dismiss the Class A Partners from the above-
16 entitled action accordingly.

17 4. In light of the Parties’ settlement, the Parties request a continuance of the current
18 pretrial conference and trial dates, as well as the related deadline for pretrial filings, to conserve
19 Court and Party resources and to allow the Parties to expend their efforts on finalizing the
20 Settlement Agreement. The Parties believe that a continuance of 45 days will allow them to
21 finalize and execute the Settlement Agreement and have the Class A Partners dismissed.

22 5. The declaration of Melissa S. Lor in support of the Stipulation has been
23 concurrently filed herewith.

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1 THEREFORE, it is hereby stipulated by and between the Parties, subject to approval by
2 the Court, as follows:

- 3 (1) the pretrial conference, currently set for June 23, 2014, shall be continued ~~for 45 days;~~ to August 4, 2014
4 (2) the deadline for pretrial filings, currently set for June 9, 2014, shall be continued ~~for~~
5 to July 21, 2014
45 days; and
6 (2) the bench trial, currently set for July 21, 2014, shall be continued ~~for 45 days.~~ to August 25, 2014

7
8 Dated: June 5, 2014

SCHNADER HARRISON SEGAL & LEWIS LLP

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10 By: /s/ Melissa S. Lor
11 T. Scott Tate
12 Melissa S. Lor
13 Attorneys for Plaintiff
United States Small Business
Administration in Its Capacity as Receiver
for Rocket Ventures II SBIC, L.P.

14
15 Dated: June 5, 2014

COOLEY LLP

16 By: /s/ Matthew D. Brown
17 Gordon C. Atkinson
18 Matthew D. Brown
19 Abigail E. Pringle
Counsel for Rocket Ventures SBIC Partners,
LLC; Rocket Ventures II CEO Fund, L.P.;
and Rocket Ventures II, L.P.

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21 **PURSUANT TO STIPULATION, IT IS SO ORDERED:**

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23
24 Dated: June 6, 2014


Honorable Judge Jeffrey S. White
United States District Court Judge